

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

RUSSELL ZINTER; ET AL.

Plaintiffs,

v.

CIVIL NO. 5:18-cv-680

**CHIEF JOSEPH SALVAGGIO;
ET AL.**

Defendants.

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiffs and Defendants submit this Joint Motion to Modify the Scheduling Order pursuant to Fed. R. Civ. P. 16(b)(4). In support of this Joint Motion, Plaintiffs and the Leon Valley Defendants state the following:

1. Plaintiffs initiated this 42 U.S.C. § 1983 action on July 4, 2018 (ECF #1).
2. As the Court certainly recalls, TRO's were filed, hearings were held, and motions were filed, culminating in this case being stayed until October 14, 2020.

3. Given that Leon Valley Defendants answered on January 5, 2021 and Bexar County Defendants moved to dismiss on January 25, 2021, no discovery has been able to be completed yet, and certainly no expert reports have been able to be completed. In fact, the Parties have not been able to determine yet with specificity which experts they will need. Furthermore, the undersigned have just received the files and are in the midst of gaining pertinent knowledge of the complex legal issues in this matter. Therefore, good cause exists to modify the Scheduling Order as requested.

4. The Parties therefore request the following adjusted deadlines, adjourned follows:

Event	New Deadline
Expert Witness Disclosures Due:	Plaintiff: 9/27/2021 Defendant: 10/25/2021
Fact Discovery Ends:	12/13/2021
Dispositive Motions Due:	1/24/2022

5. The Parties will endeavor to meet all remaining deadlines. There will be no prejudice to any of the Parties if the Court grants the requested modification of the Scheduling Order.

WHEREFORE, Plaintiffs and the Leon Valley Defendants respectfully ask this Honorable Court to Grant their Joint Motion to Modify Scheduling Order.

Respectfully submitted,

GRABLE GRIMSHAW MORA PLLC

Dated: June 11, 2021

/s/ Brandon J. Grable

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 11th day of June, 2021, a copy of the foregoing Joint Motion to Modify Scheduling Order was served via the Court's CM/ECF system, in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court, to all counsel of record.

/s/ Brandon J. Grable